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VIA OVERNIGHT AND ELECTRONIC MAIL

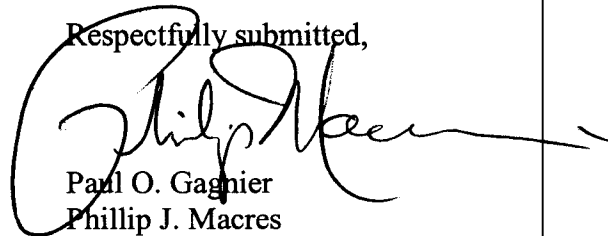
Mary Cottrell, Secretary
Massachusetts Department of Telecommunications and Energy
One South Station
Boston, MA 02110

Re: D.T.E. 03-60; Responses and Objections of Lightship Telecom, LLC to AT&T
Communications of New England Inc.'s First Set of Information Requests to
CLECs

Dear Ms. Cottrell:

Lightship Telecom, LLC, by its undersigned counsel, files its Responses and Objections to AT&T Communications of New England Inc.'s First Set of Information Requests to CLECs in the above-referenced matter.

Respectfully submitted,



Paul O. Gagnier
Phillip J. Macres

Counsel to Lightship Telecom, LLC

Enclosure

cc: Ms. Paula Foley (2 copies)
Mike Isenberg
April Mulqueen
Berhane Adhanom
Asish Shrestha
Deb Conklin
Peter Allen
D.T.E. 03-60 Service List

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Proceeding by the Department of Telecommunications
and Energy on its own Motion to Implement the
Requirements of the Federal Communications
Commission's Triennial Review Order Regarding
Switching for Mass Market Customers

D.T.E. 03-60

**RESPONSES AND OBJECTIONS OF LIGHTSHIP TELECOM, LLC
TO AT&T COMMUNICATIONS OF NEW ENGLAND, INC.'S
FIRST SET OF INFORMATION REQUESTS TO CLECs**

Lightship Telecom, LLC's ("Lightship") hereby submits its answers and objections to AT&T Communications of New England, Inc. ("AT&T") First Set of Information Requests to Competitive Local Exchange Carriers.

GENERAL OBJECTIONS

Lightship makes these General Objections to the Data Requests and incorporates each of these General Objections into its specific objections to each Data Request.

1. Lightship objects to the Data Requests to the extent that they seek information that is privileged or otherwise exempt from discovery, including but not limited to documents or information protected by the attorney-client privilege, the work-product doctrine, or the trade-secrets doctrine.

2. Lightship has made a reasonable effort to respond to each and every Data Request as it understands and interprets such Request. If AT&T should assert an interpretation of any Data Request that differs, Lightship reserves the right to supplement or amend its objections and responses. Lightship reserves the right to produce responsive documents or information received after the date of its Responses.

3. Lightship objects to the requests to the extent they seek to impose an obligation on Lightship to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such data requests are overly broad and unduly burdensome.

4. Lightship objects to the data requests to the extent they seek information beyond LATAS 128 AND 126 in the Commonwealth of Massachusetts.

5. Lightship expressly reserves and does not waive any and all objections it may have to the admissibility, authenticity or relevancy of the responses produced pursuant to the Data Requests.

OBJECTIONS TO AT&T'S REQUESTS

Many of the specific objections that Lightship makes are applicable to more than one of AT&T's Requests. For this reason, Lightship provides the following definitions of those objections and, where applicable, repeat only the defined term in stating their specific objections.

1. *Not Relevant*: the request is not relevant to any specific claims, defenses, issues or questions presented in this proceeding and is not reasonably calculated to lead to the discovery of data relevant to resolution of these issues.

2. *Unduly Burdensome*: the request is unduly burdensome in that providing the requested data (i) would require an unreasonable expenditure of time and resources to search for documents or information, (ii) is cumulative and/or has only a limited likelihood of leading to the discovery of data relevant to resolution of the specific issue and either (a) the value of providing the data is outweighed by the burden of production or (b) AT&T can obtain the data through publicly available information.

3. *Overly Broad*: the request seeks a general category of information within which only certain portions of the information are reasonably related to the subject matter of this proceeding.

4. *Vague and Ambiguous*: the request is vague and ambiguous in that it does not describe the data sought with particularity or fails to convey with reasonable clarity what is being requested and, as such, the responding party cannot reasonably determine the intended meaning, scope or limits of AT&T' Request.

5. *Extremely Sensitive, Proprietary, and Confidential*: the requested data relates to issues, matters, or materials that contain extremely proprietary, confidential, and/or trade secret information which would cause competitive harm to Lightship if disclosed.

6. *Calls for a Legal Conclusion*: the request calls for a conclusion of law.

SPECIFIC RESPONSES TO REQUESTS

Lightship's specific responses to AT&T's discovery, which incorporate the General Objections above and may include specific objections, are provided below.

Lightship Telecom, LLC

Commonwealth of Massachusetts

DTE 03-60

Respondent: Nego Pile

REQUEST: AT&T, Set #1

DATED: December 18, 2003

ITEM: Please confirm whether the CLEC is a competitive local
AT&T - Lightship 1-1 exchange carrier ("CLEC") providing telecommunications
service in Massachusetts, and state whether the CLEC is an
affiliate of such a CLEC or of an incumbent local exchange
carrier ("ILEC") within Massachusetts. If the is an affiliate of
another CLEC or an ILEC, please identify the affiliate and
describe the affiliation. For purposes of these Requests,
"affiliate" shall be as defined in the Communications Act of
1934. Section 3 of the Act defines the term "affiliate" as "a
person that (directly or indirectly) owns or controls, is owned or
controlled by, or is under common ownership or control with,
another person. For the purposes of this paragraph, the term
'own' means to own an equity interest (or the equivalent
thereof) of more than 10 percent." 47 U.S.C. § 153(1)

LIGHTSHIP
RESPONSE: Subject to the General Objections, Lightship provides the
following response:

In Massachusetts, Lightship is a CLEC and is unaffiliated with
an ILEC or another CLEC.

Lightship Telecom, LLC

Commonwealth of Massachusetts

DTE 03-60

Respondent: Nego Pile

REQUEST: AT&T, Set #1

DATED: December 18, 2003

ITEM: Please state whether the CLEC currently uses non-ILEC
AT&T - Lightship 1-2 switches to provide local exchange service to Massachusetts customers via analog voice-grade loops. (For purposes of this question, please do not include any DS-0 or voice grade switched circuits that are part of a T1 circuit or a DS-1 or above circuit.) If so, for each such switch please provide the following information:

- a. The switch type, including manufacturer and model;
- b. The 8-digit common language location identifier ("CLLI") code as it appears in the Local Exchange Routing Guide ("LERG");
- c. The switch location by street address, city or town, and state if other than Massachusetts;
- d. A list of all NPA/NXX codes or 1000s blocks of numbers served with the switch;
- e. Currently equipped and currently utilized line-side capacity, by number of DS0 and DS1 circuits;
- f. The number of customers being served by the switch who receive:
 - i. Only voice service;
 - ii. Only data service; and
 - iii. Voice and data service; and
- g. A list of all Verizon-Massachusetts ("Verizon") central offices ("COs") in which the CLEC has a collocation arrangement which subtends to the switch.

LIGHTSHIP RESPONSE: In addition to the General Objections, Lightship objects to this request on the grounds that it is *not relevant* and *overly broad*.

Subject to the foregoing objections, Lightship provides the following response:

Lightship does not offer services to customers using voice-grade loops served by a non-ILEC switch.

Lightship Telecom, LLC

Commonwealth of Massachusetts

DTE 03-60

Respondent: Nego Pile

REQUEST: AT&T, Set #1

DATED: December 18, 2003

ITEM: Please provide the following general information regarding any
AT&T - Lightship 1-3 local exchange service that the CLEC is currently offer to customers in Massachusetts using voice-grade loops served by a non-ILEC switch (i.e., excluding service offered via UNE-P or via T1 circuits or DS1 or above circuits).

- a. Does the CLEC currently provide local exchange service to **residential** customers in Massachusetts using voice-grade loops served by a non-ILEC switch? Are you currently advertising or marketing this service, and if so how?
- b. Do you currently provide local exchange service to **business** customers in Massachusetts using voice-grade loops served by a non-ILEC switch? Are you currently advertising or marketing this service, and if so how?
- c. If the CLEC has offerings of local exchange service using voice-grade loops served by a non-ILEC switch that are targeted to specific customer segments within Massachusetts (e.g., a residential offering, a small business offering, an offering available in only a portion of the state, etc.), please provide a list and description of these offerings, including a description of the service offered and a full explanation of the customer segment to which it is offered or provided. Please also indicate which, if any, of these offerings are provisioned on a UNE-L basis, and where.

LIGHTSHIP
RESPONSE: In addition to the General Objections, Lightship objects to this request on the grounds that it is *not relevant, overly broad*, and seeks publicly available information.

Subject to the foregoing objections, Lightship provides the following response:

Lightship does not offer services to customers using voice-grade loops served by a non-ILEC switch.

Lightship Telecom, LLC

Commonwealth of Massachusetts

DTE 03-60

Respondent: Nego Pile

REQUEST: AT&T, Set #1

DATED: December 18, 2003

ITEM: Please state whether the CLEC leases voice-grade loops from AT&T - Lightship 1-4 Verizon to provide local exchange service in Massachusetts on a UNE-L basis. (For purposes of this question, please do not include any DS-0 or voice grade switched circuits that are part of a T1 circuit or a DS-1 or above circuit.) If so, please provide, for the most recently available point in time (specifying what it is), and for each Verizon wire center serving area in which you offer service (if the data is available), for each CLEC switch through which you offer service (identifying switches by CLLI code), and on a statewide basis, the number for your company of:

- a. Residential customers so served;
- b. Business customer locations so served with 1 to 4 lines;
- c. Business customer locations so served with 5 to 9 lines;
- d. Business customer locations so served with 10 to 16 lines; and
- e. Business customer locations so served with 17 to 24 lines.

LIGHTSHIP RESPONSE: In addition to the General Objections, Lightship objects to this request on the grounds that it is *not relevant* and *overly broad*.

Subject to the foregoing objections, Lightship provides the following response:

Lightship does not lease voice-grade loops from Verizon to provide local exchange services on a UNE-L basis.

Lightship Telecom, LLC

Commonwealth of Massachusetts

DTE 03-60

Respondent: Nego Pile

REQUEST: AT&T, Set #1

DATED: December 18, 2003

ITEM: For each Verizon CO in which the CLEC maintains a
AT&T - Lightship 1-5 collocation arrangement used to provide service to customers
using unbundled voice-grade loops (i.e., excluding service
offered via UNE-P or via T1 circuits or DS1 or above circuits)
on a UNE-L basis, please provide the total number of loops at
the end of each quarter from January 1, 2002, to the present for
the following categories:

- a. Residential;
- b. Business customer locations with 1 to 4 lines;
- c. Business customer locations with 5 to 8 lines;
- d. Business customer locations with 9 to 16 lines; and
- e. Business customer locations with 17 to 24 lines.

LIGHTSHIP
RESPONSE: In addition to the General Objections, Lightship objects to this
request on the grounds that it is *not relevant* and *overly broad*.

Subject to the foregoing objections, Lightship provides the
following response:

Not applicable.

Lightship Telecom, LLC

Commonwealth of Massachusetts

DTE 03-60

Respondent: Nego Pile

REQUEST: AT&T, Set #1

DATED: December 18, 2003

ITEM: For each Verizon CO where the CLEC serves customers on a
AT&T - Lightship 1-6 UNE-L basis, and for each quarter since January 1, 2002, please
provide the following information:

- a. The number of ILEC-to-CLEC hot cuts that the CLEC requested from Verizon, and the number of such hot cuts that Verizon performed for the CLEC;
- b. The number of CLEC-to-CLEC hot cuts that the CLEC requested from Verizon, and the number of such hot cuts that Verizon performed for the CLEC;
- c. A breakdown of performed hot cuts by the type of hot cut (e.g., individual or batch);
- d. The percentage of hot cuts that required a field dispatch; and
- e. The percentage (listed separately) of hot cuts:
 - i. That were not completed by the scheduled due date; and
 - ii. That resulted in customer-affecting line trouble.

LIGHTSHIP
RESPONSE: In addition to the General Objections, Lightship objects to this request on the grounds that it is *not relevant* and *overly broad*. In addition, Lightship objects to the data request on the grounds that it is *unduly burdensome* because the information requested is not readily available and would require the preparation of a special report or study.

Subject to the foregoing objections, Lightship provides the following response:

Lightship does not maintain the information requested.

Lightship Telecom, LLC

Commonwealth of Massachusetts

DTE 03-60

Respondent: Nego Pile

REQUEST: AT&T, Set #1

DATED: December 18, 2003

ITEM: Please describe the method or methods by which the CLEC
AT&T - Lightship 1-7 requests hot cuts from Verizon. Please also describe the
method or method by which the CLEC obtains notification of
completed hot cuts.

LIGHTSHIP
RESPONSE: In addition to the General Objections, Lightship objects to this
request on the grounds that it is *unduly burdensome* because the
information requested is not readily available and would require
the preparation of a special report or study

Subject to the foregoing objections, Lightship provides the
following response:

Lightship does not maintain the information requested.

Lightship Telecom, LLC

Commonwealth of Massachusetts

DTE 03-60

Respondent: Nego Pile

REQUEST: AT&T, Set #1

DATED: December 18, 2003

ITEM: Please state whether the CLEC leases *UNE-P* arrangements
AT&T - Lightship 1-8 from Verizon to provide local exchange service in
Massachusetts. If so, please provide, for the most recently
available point in time (specifying what it is), and for each
Verizon wire center serving area in which you offer service (if
the data is available), and on a statewide basis, the number for
your company of:

- a. Residential customers so served;
- b. Business customer locations so served with 1 to 4 lines;
- c. Business customer locations so served with 5 to 9 lines;
- d. Business customer locations so served with 10 to 16
lines; and
- e. Business customer locations so served with 17 to 24
lines.

LIGHTSHIP
RESPONSE: In addition to the General Objections, Lightship objects to this
request on the grounds that it is *not relevant* and *overly broad*.
In addition, Lightship objects to subsections b-d of the data
request on the grounds that it is *unduly burdensome* because the
information requested is not readily available and would require
the preparation of a special report or study.

Subject to the foregoing objections, Lightship provides the
following response:

- a. Not applicable.
- b.-e. Lightship does not maintain the information requested.

Lightship Telecom, LLC

Commonwealth of Massachusetts

DTE 03-60

Respondent: Nego Pile

REQUEST: AT&T, Set #1

DATED: December 18, 2003

ITEM: If the CLEC provides cable television service in Massachusetts, please state for the state as a whole and, to the extent available, for each city or town in Massachusetts:

AT&T - Lightship 1-9

a. To how many customer locations does the CLEC provide local exchange service?

b. To what percent of the CLEC's telephony customers does the CLEC provide standalone local exchange service, without also providing either broadband or cable television service?

What is the typical or average price for this service?

c. To what percent of the CLEC's telephony customers does the CLEC provide local exchange service together with broadband service, without also providing cable television service? What is the typical or average price for this combined service?

d. To what percent of the CLEC's telephony customers does the CLEC provide local exchange service together with cable television service, without also providing broadband service?

What is the typical or average price for this combined service?

e. To what percent of the CLEC's telephony customers does the CLEC provide local exchange service together with both cable television and broadband service? What is the typical or average price for this combined service?

LIGHTSHIP
RESPONSE: Subject to the General Objections, Lightship provides the following response:

Not applicable.

Lightship Telecom, LLC

Commonwealth of Massachusetts

DTE 03-60

Respondent: Nego Pile

REQUEST: AT&T, Set #1

DATED: December 18, 2003

ITEM: Please state whether the CLEC owns one or more dedicated
AT&T - Lightship 1-10 transport circuits which provides an unswitched transmission path at a DS1 or higher level between any two Verizon central offices at which the CLEC maintains active physical collocation facilities. If the answer is yes, please provide the following information:

- a. As to each such pair of central offices, state:
 - i. The common name, address and CLLI code for each pair of central offices;
 - ii. The transmission level of each dedicated transport circuit terminating at both physical collocation facilities (e.g., DS1, DS3, OC3, etc.); and
 - iii. Whether the CLEC is "operationally ready" (as the phrase is used in Triennial Review Order ¶ 406) to provide dedicated transport between those two Verizon central offices.
- b. Does the CLEC purchase, lease or otherwise obtain UNE Transport, special access, or any other type of transmission capacity on the route, or any portion thereof, between any pair of COs just identified? If so, please identify the type of transmission capacity and the pair of central offices served by this capacity.

LIGHTSHIP
RESPONSE: Subject to the General Objections, Lightship provides the following response:

See Lightship's Response to the Department's data requests that were issued on October 9, 2003 in this proceeding.

Lightship Telecom, LLC

Commonwealth of Massachusetts

DTE 03-60

Respondent: Nego Pile

REQUEST: AT&T, Set #1

DATED: December 18, 2003

ITEM: Please state whether the CLEC has any long-term (10 or more years) dark fiber indefeasible rights-of-use ("IRUs") between any two Verizon COs at which the CLEC maintains active physical collocation facilities. If the answer is yes, please provide the following information:

AT&T - Lightship 1-11

- a. As to each pair of central offices, identify:
 - i. The common name, address and CLLI code for each pair of central offices,
 - ii. The number of dark fiber circuits terminating at both of the physical collocation facilities,
 - iii. The term of the IRU.
- b. Does the CLEC purchase, lease or otherwise obtain UNE Transport, special access, or any other type of transmission capacity on the route, or any portion thereof, between any pair of COs just identified? If so, please identify the type of transmission capacity and the pair of central offices served by this capacity.

LIGHTSHIP
RESPONSE: Subject to the General Objections, Lightship provides the following response:

No.

Lightship Telecom, LLC

Commonwealth of Massachusetts

DTE 03-60

Respondent: Nego Pile

REQUEST: AT&T, Set #1

DATED: December 18, 2003

ITEM: Please state whether the CLEC offer dedicated transport to
AT&T – Lightship 1-12 unaffiliated carriers on a wholesale basis between any pairs of
Verizon COs? If so, for each such pair of Verizon COs,
please provide the following:

- a. How such transport is offered to unaffiliated carriers
(e.g., through tariffs, standard contracts, individually
negotiated contracts),
- b. The levels (DS1, DS3, OC3, etc.) at which such
dedicated transport has been provided to wholesale
customers,
- c. The amount of unused lit capacity available for
purchase by unaffiliated carriers on a wholesale basis, at each
transmission level.

LIGHTSHIP
RESPONSE: Subject to the General Objections, Lightship provides the
following response:

Lightship does not offer its services on a wholesale basis to
other CLECs.